

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

KATHRYN KNOWLTON, et al.,

Plaintiffs,

v.

Case No. 2020-CV-01660

CITY OF WAUWATOSA, et al.,

Defendants.

**DEFENDANTS' NOTICE OF MOTION FOR SANCTIONS
PURSUANT TO FED. R. CIV. PROC. 11**

Defendants, by their attorneys, Wirth + Baynard, hereby move this Court for the entry of an Order imposing sanctions pursuant to Rule 11 of the Federal Rules of Civil Procedure on the basis that Plaintiffs' factual allegations and maintenance of claims in the Fourth Amended Complaint are frivolous. The grounds of this Motion are more fully set forth in the accompanying Brief in Support of Defendants' Motion and supporting declarations which are incorporated by reference as if fully set forth herein.

Dated at Wauwatosa, Wisconsin this 20th day of April 2022.

WIRTH + BAYNARD
Attorneys for Defendants

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